COMMENTS OF ARIZONA GMRS REPEATER CLUB, INC.

REGARDING GN DOCKET 25-133

April 10, 2025

A. Background

The Arizona GMRS Repeater Club, Inc., is an authorized 501(c)(3) non-profit corporation, which represents over 580 General Mobile Radio Service (GMRS) radio operators. With the exception of 6 Associate members, these are all dues paying members. Our screening process verifies that all members are GMRS licensees. The membership includes many different areas of experience, such as Amateur radio, emergency services, professional 9-1-1 operators/dispatchers and commercial two-way radio sales and service. They also have many interests, including outdoor and off-road activities.

Our organization operates repeaters to extend range. Public information and training classes about two-way radio and its proper use are also provided.

A separate division, the Arizona Emergency Services Group provides procedures, training and exercises related to emergency communications. In addition, messages from trained Skywarn operators on GMRS frequencies are relayed to the National Weather Service during severe weather.

Our members and organization both have a vested interest in practical use of the GMRS radio service.

B. Factors for Consideration

1. Many western states, such as Arizona, New Mexico, Colorado and Utah, have large geographic areas within each state that contain a small population and offer limited cellular network or internet capabilities. Such areas are expansive with varying terrain and 100–200 miles between significant population centers. Residents in these areas often live with high risk of damaging natural hazards, such as wildfires, flooding, etc. These natural hazards have, in the past, resulted in communication infrastructure damage and loss of contact for residents. These hazards also exist in many other states. Two-way radio such as GMRS has demonstrated that it can provide critical communications during such events. In some areas, residents do not have cellular or internet connectivity even during normal everyday conditions. Having the capability to link repeaters in such areas is often a necessity.

. 2. The technology currently exists that allows for connectivity via linking GMRS repeaters. This includes remote control operation in which linking can be enabled or disabled, as necessary.

3. This repeater linking technology was already in use by many GMRS licensees for many years, until a 2024 clarification by the FCC that indicated such use was in violation of Part 95 rules. The equipment used was acquired by private persons and organizations across the nation at great cost.

4. In an attempt to be compliant with FCC rules, licensees, including the AGRC, ended operation of the technology used for linking repeaters.

C. Proposal

1. The AGRC suggests that the FCC eliminate rules that restrict residents from connecting using the General Mobile Radio Service (GMRS), when the technology to do so is available and has been proven.

2. We propose a rulemaking action in which the FCC would allow all GMRS repeaters to be linked by any means (wireline or wireless) for the purpose of remote control or to convey messages. This would not involve connection to the public switched telephone network (PSTN).

3. This would require rescinding section 95.1733(a)(8) and making revisions to other sections, as necessary.

4. It is understood that limited spectrum exits for GMRS stations, only eight repeater pairs are available and that the FCC intends that GMRS be used for communication that is not at a great distance.

5. This potential problem could be remedied by a rule promulgated by the FCC which requires that a GMRS licensee not be allowed to link to more than two other repeaters within a 50 mile distance. This would then eliminate multiple repeaters being linked within the same area and carrying the same message. Linking would be allowed for repeaters stations outside the 50 mile limit, as necessary, but with a limitation of no more than 300 miles.

D. Conclusion

It is of great importance for residents in western states, and in all states, to have the capability to connect with GMRS linked repeaters, especially during emergency situations. This practical communication method can be indispensable for areas in which normal infrastructure does not exist or is damaged. It is certainly in the public interest. Due to the above listed factors, our organization strongly recommends the proposal set forth above. We believe that it coincides with the FCC initiatives to reduce unnecessary and burdensome regulation listed in Docket 25-133.

Respectfully submitted,

Gary E. Hefley, President
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